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8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

10 In re

11 THE LITIGATION PRACTICE GROUP P.C.,

12 Debtor.
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Case No: 8-23-bk-10571-SC

Chapter 11

CHAPTER 11 TRUSTEE’S RESPONSE TO
MOTION FOR ALLOWANCE OF
ADMINISTRATIVE CLAIM FILED BY
RANDALL BALDWIN CLARK,
ATTORNEY AT LAW, PLLC [DK.
NO.707]

Date: May 23, 2024
Time: 11:00 a.m.
Ctrm: Courtroom 5C
411 West Fourth Street
Santa Ana, CA 92701

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20 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
21 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

22 Richard A. Marshack, the duly appointed Chapter 11 Trustee (“Trustee”) of the Bankruptcy
23 Estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor” or “LPG”), respectfully submits
24 this response to the Motion for Allowance of Administrative Claim filed by Randall Baldwin Clark,
25 Attorney at Law, PLLC (“Clark”), Dk. No. 707 (“Motion”).
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1. Pertinent Factual Background

Pre-petition, Debtor was a law firm that provided consumer debt resolution services servicing more than 50,000 customers across the United States. In 2022, Debtor's annual revenue exceeded \$150 million.

On March 20, 2023, Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana Division ("Bankruptcy Case"). Prior to the bankruptcy, Debtor fraudulently transferred all its assets and clients. As of the petition date, Debtor had virtually no assets or clients.

On May 8, 2023, Richard A. Marshack was appointed as the Chapter 11 Trustee of the Debtor's estate. Docket No. 65.

Upon his appointment, Trustee filed litigation against numerous defendants, including Phoenix Law Group, Inc. ("Phoenix"), seeking, among other relief, to avoid and recover Debtor's fraudulent transfers. Adv. Case No. 8:23-ap-01046-SC ("Avoidance Adversary").

On June 27, 2023, Trustee filed a stipulation with Phoenix avoiding, recovering, and preserving the legal service agreements between Debtor and its consumer clients, thus recovering Debtor's assets.

On July 22, 2023, the Court granted Trustee's sale motion and entered an order approving the sale of Debtor's assets. Docket No. 320. The sale closed on August 4, 2023.

On October 16, 2023, the Court entered an Order setting the Administrative Claims Bar Date as November 21, 2023. Docket No. 577.

On November 21, 2023, a Motion for Allowance and Payment of Administrative Fees was filed by Randall Baldwin Clark, Attorney at Law, PLLC. Docket No. 707.

On November 22, 2023, a Motion for Allowance of Administrative Claim was filed by Randall Baldwin Clark, correcting his earlier filing. Docket No. 717.

On January 5, 2024, Trustee filed a Motion to Continue Hearing on the motions for allowance of administrative expense claims. Docket No. 816.

1 On January 8, 2024, the Court entered an Order granting the Trustee's Motion to Continue
2 Hearing, continuing the initial hearings on all matters to February 29, 2024, and treating those
3 hearings as status conferences. Docket No. 818.

4 On February 15, 2024, Trustee filed an Omnibus Unilateral Report Regarding Status of
5 Motions for Allowance of Administrative Expense Claim Under 11 U.S.C. §503(b) ("Feb. 15 Status
6 Report"). Docket No. 940.

7 On March 6, 2024, the Court entered a Scheduling Order, setting April 11, 2024, as the
8 deadline for Trustee to respond to any of the motions for allowance of administrative expense claims
9 for a specific group of claimants, including Clark. Dk No. 986.

10 On April 11, 2024, Trustee filed an Omnibus Stipulation to Modify Briefing Schedule and to
11 Continue Hearing on Motion for Allowance of Administrative Expense Claims filed by a specific
12 group of claimants, including Clark ("Omnibus Stipulation"). Docket No. 1101.

13 On April 12, 2023, the Court entered an Order approving the Omnibus Stipulation, setting
14 May 2, 2024, as the deadline for the Trustee to file a response to any of the motions for allowance of
15 administrative claims, including the claim filed by Clark. Docket No. 1107.

16 Trustee diligently investigated the administrative claim of Clark and the Parties have
17 exchanged documents and information.

18 In the course of Trustee's investigation, Trustee verified that Clark had submitted appropriate
19 records for 203.3 hours ("Legal Hours") of post-petition legal work on Debtor's client files post-
20 petition.

21 **2. Trustee's Response**

22 Administrative priority is allowed for claims under 11 U.S.C. § 503(b) ("Section 503") where
23 a claim (1) is incurred post-petition, (2) directly and substantially benefits the estate, and (3) is an
24 actual and necessary expense of preserving an estate. *See* 11 U.S.C § 503(b).

25 "[A]n administrative expense allowable under § 503(b)(1)(a) is to be determined on an
26 objective standard that measures the fair and reasonable value of the goods and services
27 rendered." *In re Foundation Group Systems, Inc.*, 141 B.R. 196,199 (Bankr. E.D. Cal. 1992)
28 (citing *In re Dant & Russell, Inc.*, 853 F.2d 700, 707 (9th Cir. 1988)). Although there is a

1 presumption that the amount reserved under an agreement constitutes fair and reasonable value, the
2 presumption may be rebutted. *Id.* at 199-200. “[T]he court is charged with determining the
3 reasonable value of services rendered, and is not bound by the terms of [an] ... agreement.” *Id.* at
4 200.

5 The Trustee has determined that the maximum reasonable value of the services provided by
6 the attorney claimants is a rate reflective of a salary of \$180,000 per year based on the overall review
7 of the contracts into which the Debtor has entered with its nationwide attorneys, accounting for cost-
8 of-living geographic differences. The Trustee determined that a yearly salary of \$180,000 is a high
9 estimate of payment for legal work in the field of credit collection and debt resolution litigation. A
10 yearly salary of \$180,000 calculates to \$86.54 per hour. It is therefore fair and reasonable to create a
11 maximum ceiling cap in compensating the attorney claimants at a rate of \$86.54 per hour of work for
12 legal work performed on Debtor’s client files.

13 Clark submitted the Motion to be compensated for 203.3 hours at \$225/hr for the Legal
14 Hours (proportionally reflective of a salary of \$468,000/yr). Trustee has communicated to Clark that
15 pursuant to the reasonableness standard of administrative expenses, the maximum amount at which
16 post-petition legal work would be compensated by the Trustee in administering Debtor’s estate
17 would be at \$86.54/hr. Clark has not yet provided a definitive answer to Trustee’s communication in
18 writing as of this filing. Rather than asking to continue the hearing, Trustee submits this response. If
19 Clark accepts this amount, then the matter will be resolved. If not, Trustee requests that the Court
20 allow the administrative claim in the amount of \$17,593.58 (203.3 hours x \$86.54 per hour).

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1 As such, the Trustee asserts that an amount to which the Trustee will not object as a
2 reasonable value for the services provided by Clark in the post-petition period is \$17,593.58.

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4 DATED: May 2, 2024

MARSHACK HAYS WOOD LLP

5 /s/ D. Edward Hays

6 By: _____

D. EDWARD HAYS

7 ALINA MAMLYUK

8 Attorneys for Chapter 11 Trustee,

RICHARD A. MARSHACK

PROOF OF SERVICE

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **CHAPTER 11 TRUSTEE'S RESPONSE TO MOTION FOR ALLOWANCE OF ADMINISTRATIVE CLAIM FILED BY RANDALL BALDWIN CLARK, ATTORNEY AT LAW, PLLC [DK. NO.707]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 2, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **May 2, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR – MAIL REDIRECTED TO TRUSTEE

THE LITIGATION PRACTICE GROUP P.C.
17542 17TH ST, SUITE 100
TUSTIN, CA 92780-1984

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 2, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 2, 2024 Layla Buchanan

Date

Printed Name

/s/ Layla Buchanan

Signature

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